United States Department of the Interior

IN REPLY REFER TO:

FWS/RIFO

FISH AND WILDLIFE SERVICE
Ecological Services
Rock Island Field Office
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Rock Island, Illinois 61201
Tel: 309/793-5800 Fax: 309/793-5804

July 24, 2000

Kevin Turner
U.S. Environmental Protection Agency
c/o Crab Orchard National Wildlife Refuge
8588 Rt. 148
Marion, IL 62959

Dear Mr. Turner:

This letter addresses concerns of the US Fish and Wildlife Service (Service) in regard to the Time Critical Removal Action Work Plan Dead Creek Sediment and Soil, Sauget and Cahokia, Illinois, document dated June 30, 2000. This document was submitted to this office by Solutia, Inc. at your request. Per your request, the enclosed comments on this plan are being directed to you for submission to Solutia, Inc.

On June 13th, Rock Island Field Office personnel attended a meeting in Sauget, IL regarding the removal of contaminated sediments and replacement of existing culverts associated with Dead Creek. During this meeting concerns were raised by the Service and Illinois Department of Natural Resources (IDNR) about impacts to the wetland areas of Creek Segment F caused by fluctuations in water levels resulting from the increased flows of Dead Creek. It appears that Solutia, Inc is using these comments to justify, in part, the non-compliance with the Dead Creek Culvert Replacement Project Unilateral Administrative Order (UAO) issued in June 1999. I want to assure you that the concerns expressed in the meeting were not intended to stop activities designed to reduce the flooding of the creek and deposition of contaminated sediments in residential areas associated with Creek Segment B. Alternatives which allow compliance with the UAO and minimize the impacts to natural resources were suggested at the meeting and are reiterated in the enclosed comments.

I would like to thank you for the opportunity to be involved in activities at the Sauget Area 1 and Area 2 Superfund Sites. If you have any concerns regarding this matter, please contact Kevin de la Bruere of my staff at extension 530.

Sincerely,

Richard C. Nelson
Supervisor

Enclosure

cc: Henry, (IDNR) w/enclosure
Morin, (IEPA) w/enclosure

U.S. Fish and Wildlife Service Comments on Time Critical Removal Action Work Plan Dead Creek Soil and Sediment Removal, Sauget and Cahokia, Illinois dated June 30, 2000

Section 4.3.1 page 4-3 last paragraph: This section states that larger culverts will not be installed at this time. One reason stated for this decision is that pushing a large volume of stormwater down Dead Creek will result in a rapidly fluctuating water levels in the Creek Segment F wetlands, which will have an adverse effect on the wetlands. While this comment is true, several alternatives exist which would allow the replacement of the culverts as outlined in the June 1999 Dead Creek Culvert Replacement Project Unilateral Administrative Order and minimize injury to the Creek Segment F wetlands:

1. After installation of the HDPE liner, a series of barriers could be installed in the creek. This would create an artificial meander which would effectively increase the length of the stream and increase stormwater retention time while providing increased drainage during rain events. Increased stormwater retention time would mean a reduction in downstream water level fluctuations and reduce the impacts to the wetland community.

2. In various locations along the stream, install retention ponds. Retention ponds would receive waters and reduce the pulse of water associated with rain events. This would increase stormwater retention time resulting in a reduction in downstream water level fluctuations and, therefore, a reduction in impact to the wetland community. Additionally, this alternative would provide a more natural stream habitat by simulating the riffle pool sequencing found in natural streams.

3. In combination with either of the above alternatives, replanting the stream banks and flood plain with native riparian vegetation would slow water flows and collect entrained sediments. The reduction in flow rate would increase stormwater retention time in the affected creek segments, further reducing adverse impacts in Creek Segment F wetlands associated with rapidly fluctuating water levels.

4. Although this alternative is not desirable, the culverts could be replaced, and the wetlands could be replaced in kind within the watershed through a Natural Resource Damage Assessment and Restoration Project.

Section 4.3.3 page 4-5 last paragraph: See comments on Section 4.3.1 page 4-3 last paragraph.

Section 4.3.4 page 4-7 last paragraph: See comments on Section 4.3.1 page 4-3 last paragraph.

Section 4.3.5 page 4-10 last paragraph: See comments on Section 4.3.1 page 4-3 last paragraph.

Section 8.0 page 8-1 last paragraph: This section states that the channel may be allowed to revegetate naturally through the use of open block articulated mats if hydrostatic forces allow.

In addition to the channel revegetation, areas where bank vegetation has been disturbed should be planted with native riparian plants to stabilize the banks, filter stormwater surface runoff, and provide habitat for various bird species.